

REMARKS

Claims Status

Applicant acknowledges, with appreciation, the allowance of claims 34-41, as well as the indication that claim 28 contains allowable subject matter. Claims 25-44 are now presented for examination, with claims 25, 28 and 34 being in independent form.

Claims 25-33 have been amended. Dependent claim 28 has been placed into independent form. Dependent claims 42-43 have been added. Support for the amendments to independent claim 25 may be found, for example, at pg. 5, lines 2-10 of the specification as originally filed. Additional support for the amendments to independent claim 25 may be found, for example, in independent claim 34 which has been allowed. The amendments to dependent claims 26, 27 and 29-33 correct minor claim wording, and are cosmetic in nature. No new matter has been added. Reconsideration of the application, as amended, is respectfully requested.

Overview of the Office Action

Claims 25-27 and 30-33 stand rejected under 35 U.S.C. §103(a) as obvious over GB 2 366 705 (“*Shi*”) in view of U.S. Patent No. 6,961,322 (“*Viola*”) and “Digital Cellular Telecommunications System (Phase 2+) (GSM); Universal Mobile Telecommunications System (UMTS); General Packet Radio Service (GPRS) Service Description; Stage 2 (3GPP TS 23.060 version 3.8.0 Release 1999)”, ETSI TS 123 060, V3.8.0, June 1, 2001, pgs. 134-135 (the “GSM Standard”), U.S. Pub. No. 2003/0026232 (“*Uskela*”) or U.S. Pub. No. 2004/0127237 (“*Hurtta*”).

Claim 29 stands rejected under 35 U.S.C. §103(a) as obvious over *Shi* in view of *Viola* and GSM Standard *Uskela* or *Hurtta*, and further in view of U.S. Patent No. 6,654,607 (“*Shobatake*”).

Applicant has carefully considered the Examiner's rejections and the comments provided in support thereof. For the following reasons, Applicant asserts that all claims now presented for examination in the present application are patentable over the cited art.

Patentability of Independent Claim 25 under 35 U.S.C. §103(a)

Independent claim 25 has been amended to recite, *inter alia*, "wherein said system is configured to set up at least one additional connection from at least one of said plural communications networks to said mobile terminal with an incoming call request". Support for this amendment may be found, for example, at pg. 5, lines 2-10 of the specification as originally filed. Independent claim 25 has been additionally amended to positively recite the components of the claimed access management system. Additional support for the amendments to independent claim 25 may be found, for example, in independent claim 34 which, as noted, has been allowed. No new matter has been added.

Each of the cited references, i.e. *at least, Shi* and the GSM standard, describe the connection from a mobile terminal to a specific piece of external equipment, such as a network, a server or the like. For example, *Shi* teaches that the GGSN equipment is only contacted when performing a connection. However, the GGSN equipment of *Shi* has no knowledge of all address allocation requests. Moreover, there is no additional connection from a plurality of communications networks to a mobile terminal with an incoming call request.

The GSM standard, on the other hand, is described in Applicant's instant specification. That is, the instant specification describes that the GSM standard discloses the functionality of a "Network-requested PDP Context activation" (see pg. 2, lines 1-25 of the originally filed specification). The instant application implements this functionality pursuant to performing the

address search of SGSN equipment in the mobile network for the creation of a PDP Context link (see page 19, lines 35 to 36). However, the claimed invention is specifically directed to the activation of an additional incoming call to a mobile terminal only after a mobile terminal has been identified in at least one address assignment server to which a communications network will establish the additional connection (see pg. 10, lines 15-32 of the specification) for verifying technical accessibility and user rights (see pg. 11, lines 32-34 and pg. 16, lines 2 to 9) and for checking to determine whether a user address of the mobile terminal exists in at least one incoming call request management interface that is connected to the at least one address assignment server (see pg. 11, lines 2-5) to prevent assignment of a second address corresponding to the same mobile terminal (see pg. 14, lines 20-25).

The Examiner (at pg. 2 of the Office Action) asserts that:

Shi teaches ... wherein said system is configured to set up at least one connection from at least one of said communications networks to said mobile terminal (figure 1 shows connections between mobile terminal and voice/data networks – see page 6, L20-27 teaching different services/networks too)

Applicant disagrees that the combination of *Shi/Viola*, the GSM standard, *Usekla* and/or *Hurtta* achieve applicant's system recited in amended independent claim 25.

Independent claim 25 now defines and describes “specific equipment” of the network, i.e., *inter alia*, “interfaces” for controlling the additional connection of the mobile terminal to a specific communications network with an incoming call request.

Figure 1 of the instant specification depicts applicant's claimed system. As explained at pg. 1, lines 22-25 of the specification as originally filed, “[t]he access control interface 35 assigns a network address that corresponds to the communications network 20, 21, 22 and that is sent to an access authorization interface 14 in the mobile telecommunications network. The access authorization interface 14 uses a home location register (HLR) 13 in the mobile telecommunications

network”. Within the context of the claimed invention, it should be noted that the HLR register (13) is only used when a PDP context does not exist; via the interfaces (14, 15), the RADIUS server (or network address assignment server (33)) only ascertains the user’s rights to access the HLR register.

As additionally explained at pg. 11, lines 31-34 of the instant specification, “[t]he home location register (HLR) 13 verifies the accessibility and user rights of the mobile terminal 10 with respect to an incoming call request sent from the communications network 20, 21, 22.” Moreover, “[a]s a function of the result of this verification, the access authorization interface 14 responds to the access control interface 35, which sends to the incoming call request management interface 34, authorizing or rejection the incoming call request. The user address search interface 32 assigns a user address corresponding to the mobile terminal 10 that is sent to the domain name server (DNS) 31 and from the DNS to the application server (AS) 30” (see pg. 11, line 35 to pg. 12, line 14).

In accordance with the claimed invention, the user address search interface (32) of dependent claim 26 can either access a table of the correspondences between “user AS id” identifiers and “user DNS id” identifiers or construct an identifier from the identifier in a “user AS id, command” message that is received from the application server (AS) (30) to determine the “user DNS id” identifier (see pg. 12, lines 11-14 and pg. 13, lines 25-35). Moreover, “[t]he user address search interface 32 of dependent claim 26, which is connected to the domain name server (DNS) 31, sends a ‘user DNS id, command’ command message to an incoming call request management interface 34 connected to a network address assignment (RADIUS) server 33 to perform the processing of the user address” (see pg. 13, lines 31-36 of the instant specification).

The incoming call request management interface 34 of independent claim 25 uses the network address assignment (RADIUS) server 33 to assign an address to the user for the connection to the communications network (20, 21, 22) (see pg. 17, lines 8-12 of the instant specification). In

addition, the incoming call request management interface 34, which is connected to the RADIUS server (33) sends a “user DNS id, IP address” message to the user address search interface 32 of dependent claim 26 that is connected to the DNS server (31) (see pg. 17, lines 13-17 of the instant specification).

There is no teaching or suggestion whatsoever in the cited art of such concepts that are encompassed by the claimed system of amended independent claim 25, as well as the amended dependent claims. Each of the claimed interfaces allows a different functionality, each of which is not obvious in view of the combined teachings of the cited art. As explained in the instant specification, use of these claimed component, e.g., the incoming call request interface (34), permits the user to opt to not allow receipt of the incoming calls from particular networks (see, e.g., pg. 7, lines 28-33; pg. 11, line 34 to pg. 8, line 13 and pg. 16, line 33 to pg. 17, line 7 of the instant specification). The combination of *Shi* & the GSM standard fails to teach or suggest anything about these concepts that are encompassed by the system of amended independent claim 25.

For example, the address assignment server (33) is the central component of the system of independent claim 25. This network assignment server (33) is the only equipment of the network that could possibly know all of the allocated IP addresses from all the GGSN equipment. In general, there are always several GGSNs for providing access to the same network, such as for management of the number of accesses, for security, etc. Consequently, only the network assignment server (33) of amended independent claim 25 can actually determine whether the mobile terminal already has an IP address. This is simply not the case with the *Shi* system or the teachings of the GMS standard.

Moreover, with the claimed interfaces, e.g., the access control interface (35) or the access authorization interface (14), the use of the claimed allocation server (33) allows dynamic

management of the addressing of the mobile terminal (see, e.g., pg. 5, lines 11-34 of the instant specification). Furthermore, *Viola*, the GSM standard, *Uskela* and *Hurtta*, all of which are 3GPP documents, only achieves a system in which static management of the addressing is implemented with the applicant's incoming call request management interface (34), i.e., the use of a large number of addresses with the claimed incoming call request management interface (34), but with the disadvantages described at pg. 6, lines 19-37 of the instant specification.

On the other hand, as explained at pg. 13, lines 25-30 of the specification, applicant's claimed invention allows the creation/construction of the user's identifier with a DNS server, i.e., the claimed domain name server (31), but without necessarily accessing a correspondence table (see pg. 10, lines 28-32; pg. 12, lines 7-14 and pg. 12, line 37 to pg. 14, line 11). These tables are implemented in conventional systems and provide a way to locate the user's identifier. However, the drawback with the use of such tables is that they create a large number of data associated with a large number of users, i.e., the tables become too large. Consequently, the ability to receive incoming calls from multiple communications networks is limited. This holds true even for the instance in which a small quantity of users can use multiple connections on the conventional mobile terminals of the art cited in the Examiner's proffered analysis.

Viola relates to "a method for managing dynamic internet address leasing" (see col. 1, lines 7-8). According to *Viola*, the "method manages an internet protocol address and time of validity. The method obtains (52) the IP address and validity time period for a mobile station (10). The IP address and validity time period are transmitted (53) to the mobile station (10). Prior to expiration of the validity time period the network (20) renews the IP address for a new validity time period" (see Abstract). *Viola* thus teaches a method for granting a mobile terminal with access to a network for a specific period of time.

Uskela, on the other hand, relates to a “method for reserving quality of service (QoS) in a wireless telecommunication system, which comprises at least one mobile station, a support node serving the mobile station, and a data terminal communicating with the mobile station”. According to *Uskela*, QoS is reserved and maintained by transmitting path messages and reservation messages between QoS protocol entities of the mobile station and the data terminal” (see Abstract). *Uskela* therefore has all to do with provide a high QoS level, i.e., a level of quality associated with the service.

Lastly, *Hurtta* discloses a method and apparatus for establishing multiple PDP contexts in a mobile communication system (see Abstract, lines 1-2). According to *Hurtta*, “[t]he method comprises determining the number of PDP context requests required. Preferably this step is performed by the user equipment (UE). *Hurtta* (paragraph [0031]; FIG. 3) explains that “as represented by signal 300 the UE 100 transmits an activate PDP context request to the SGSN 108, through the UTRAN 102”. *Hurtta* therefore teaches that the connection request is an outgoing request from the user equipment (UE).

However, there is no teaching or suggestion in *Viola*, *Uskela* and *Hurtta* with respect to a system that is configured to prevent assignment of a second address corresponding to the same mobile terminal, in the manner recited in amended independent claim 25. Therefore, *Viola*, *Uskela* and *Hurtta* fail to provide what *Shi* and the GSM standard lack.

In accordance with the claimed invention, the incoming call request management interface prevents the mobile terminal from assigning two addresses for the same network. Moreover, different interfaces are provided specifically for the connection via an incoming call request dialogue with different equipment of the communications networks to verify the network

address, after processing the user address of the mobile terminal in accordance with the steps recited in applicant's allowed method claims 34-41.

The combination of the cited art fails to teach or suggest a system that achieves the foregoing advantages that are encompassed by the system recited in independent claim 25.

In view of the foregoing, amended independent claim 25 is patentable over the combination of *Shi*, *Viola*, the GSM standard, *Usekla* and *Hurtta*. Withdrawal of the rejection under 35 U.S.C. §103(a) is therefore requested, and a notice to that effect is earnestly solicited.

Patentability of Dependent Claim 29 over the Prior Art under 35 U.S.C. §103

The Examiner (at pg. 5 of the Office Action) acknowledged that the combination of *Shi*, *Viola*, the GSM standard, *Usekla* or *Hurtta* fails to teach or suggest the “at least one access authorization interface (14) recited in dependent claim 29, but states that these features would have been obvious based on the teachings of *Shobatake*.

Applicant disagrees that any combination of the cited references achieves the claimed invention. There is nothing in *Shobatake* to cure the above-noted deficiencies concerning the system of amended independent claim 25.

Shobatake relates to “a system and method for communicating across various communications platforms” (see Abstract). *Shobatake* (col. 3, lines 64-66) describes the use of a unified mobility manager to register the location of a terminal with its home database in a foreign network. *Shobatake* (col. 3, line 66 thru col. 4, line 3) additionally describes that “the terminal may be found through interactions with its home database” and that “[f]urther, authentication, authorization, and accounting may be performed for a terminal outside its home network through accessing its home database”.

However, there is nothing whatsoever in *Shobatake* with respect to a system that is “configured to set up at least one additional connection from at least one of said plural communications networks to said mobile terminal with an incoming call request ... after checking to determine whether a user address of said mobile terminal exists in at least one incoming call request management interface connected to said at least one address assignment server to prevent assignment of a second address corresponding to the same mobile terminal, after verifying accessibility to said mobile telecommunications network in at least one home location register of said mobile terminal communications network,” as recited in amended independent claim 25.

The combination of *Shi*, *Viola*, the GSM standard, *Usekla* or *Hurtta* and *Shobatake*, therefore, fails to teach or suggest the features recited in independent system claim 25, let alone the features in dependent claim 29. Dependent claim 29 is, accordingly, patentable over *Shi*, *Viola*, the GSM standard, *Usekla* or *Hurtta* and/or *Shobatake*. Reconsideration and withdrawal of the rejection of claim 29 under 35 U.S.C. §103 are requested.

Dependent Claims

In view of the patentability of independent claims 25, 28 and 34, for at least the reasons presented above, each of dependent claims 26, 27, 29-33 and 35-41, as well as new dependent claims 42-44, is believed to be patentable therewith over the prior art. Each of dependent claims 26, 27, 29-33 and 35-44 additionally includes features that serve to still further distinguish the claimed invention over the applied art.

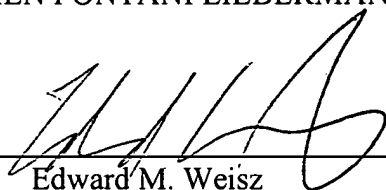
Conclusion

Based on all of the above, it is respectfully submitted that the present application is now in proper condition for allowance. Prompt and favorable action to this effect and early passing of this application to issue are respectfully solicited.

Should the Examiner have any comments, questions, suggestions or objections, the Examiner is respectfully requested to telephone the undersigned in order to facilitate reaching a resolution of any outstanding issues.

Respectfully submitted,
COHEN PONTANI LIEBERMAN & PAVANE LLP

By

A handwritten signature in black ink, appearing to read 'E. Weisz', is written over a horizontal line.

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